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By Email

Hon. George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Goodman et al. (Javaris Jenkins)
20 Cr 57 (GBD)

Dear Judge Daniels:

I represent Javaris Jenkins in the above-captioned matter. I write requesting that the Court issue an order, directing the BOP and any other medical provider to provide me with copies of my client's medical records. *See, United States v. Padin*, 20 Cr 135 (JMF), Dkt No. 72.

Mr. Jenkin suffers from asthma and is currently having problems getting the necessary medical treatment in the MCC where he is incarcerated.

Due to the fact that I am not permitted to meet with the defendant in the MCC, as well as the shelter in place order and the practical limitations on working from home without a printer, postage and other essentials combined with the BOP's insistence on a FOI request with a month's long return date, an Order directing disclosure of the information is the only practical and timely alternative to obtaining the necessary records.¹ Mr. Jenkins has authorized me by email to obtain and disclose as necessary his medical records for the purposes of making a bail application and/or trying to assist him in getting the necessary treatment while he is incarcerated. His current incarceration in the MCC makes it impractical for him to obtain the records and send them to me.

Attached hereto is a proposed Order for the Court's consideration. I respectfully request that the Court endorse the Order so that I can attempt to obtain his medical records in a timely manner.

¹ Upon information and belief, the Government may be able to secure the necessary records for this Court's inspection in considering any motion for bail.

Thank you for your immediate attention to, and consideration in, this matter.

Respectfully submitted,

/s/

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Encl.

Cc: J. Horowitz